

**TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that, on a date and at a time to be determined by the Court, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, in the Courtroom of the Honorable Lorna G. Schofield, Plaintiffs<sup>1</sup> will, and hereby do, move the Court, pursuant to Fed. R. Civ. P. 23(e), for an Order: (i) granting preliminary approval of the proposed settlement (“Settlement”) reached between Plaintiffs and defendants JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. (collectively, “JPM”) in the above-captioned action; (ii) certifying the putative Class for settlement purposes; (iii) approving the proposed form and manner of giving notice of the Settlement to the Class; (iv) approving Plaintiffs’ choice of a Settlement Administrator, Claims Administrator, and Escrow Agent; and (v) setting a

1 Plaintiffs are Aureus Currency Fund, L.P.; the City of Philadelphia, Board of Pensions and Retirement:  
Employees' Retirement System of the Government of the Virgin Islands; Employees' Retirement System of Puerto  
Rico Electric Power Authority; Fresno County Employees' Retirement Association; Haverhill Retirement System;  
Oklahoma Firefighters Pension and Retirement System; State-Boston Retirement System; Syena Global Emerging  
Markets Fund, LP; Tiberius OC Fund, Ltd.; Value Recovery Fund L.L.C.; and United Food and Commercial  
Workers Union and Participating Food Industry Employers Tri-State Pension Fund (collectively, "Plaintiffs").

hearing date for final approval of the Settlement and a schedule for various deadlines relevant thereto, and for such other and further relief as the Court deems appropriate.

Submitted herewith in support of Plaintiffs' Motion for Preliminary Approval of Settlement with JPM are: (i) the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A.; (ii) the Declaration of Christopher M. Burke in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. and the Exhibits thereto; (iii) the Declaration of Kenneth R. Feinberg in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A.; and (iv) the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice.

Dated: January 30, 2015

Respectfully submitted,

SCOTT+SCOTT, ATTORNEYS AT LAW, LLP

s/ Christopher M. Burke  
CHRISTOPHER M. BURKE (*pro hac vice*)  
WALTER W. NOSS (*pro hac vice*)  
KRISTEN M. ANDERSON (*pro hac vice*)  
707 Broadway, Suite 1000  
San Diego, CA 92101  
Telephone: 619-233-4565  
Facsimile: 619-233-0508  
cburke@scott-scott.com  
wnoss@scott-scott.com  
kanderson@scott-scott.com

-and-

SCOTT+SCOTT, ATTORNEYS AT LAW, LLP  
DAVID R. SCOTT (DS-8053)  
JOSEPH P. GUGLIELMO (JG-2447)  
DONALD A. BROGGI (DB-9661)  
SYLVIA SOKOL  
THOMAS K. BOARDMAN  
The Chrysler Building  
405 Lexington Avenue, 40th Floor  
New York, NY 10174  
Telephone: 212-223-6444  
Facsimile: 212-223-6334  
david.scott@scott-scott.com  
jguglielmo@scott-scott.com  
dbroggi@scott-scott.com  
ssokol@scott-scott.com  
tboardman@scott-scott.com

HAUSFELD LLP  
MICHAEL D. HAUSFELD  
WILLIAM P. BUTTERFIELD  
REENA ARMILLAY GAMBHIR  
TIMOTHY S. KEARNS  
NATHANIEL C. GIDDINGS  
1700 K Street, NW, Suite 650  
Washington, DC 20006  
Telephone: 202-540-7143  
Facsimile: 202-5407201  
mhausfeld@hausfeldllp.com  
wbutterfield@hausfeldllp.com  
rgambhir@hausfeldllp.com  
tkearns@hausfeldllp.com  
ngiddings@hausfeldllp.com

-and-

HAUSFELD LLP  
MICHAEL LEHMAN  
CHRISTOPHER LEBSOCK  
44 Montgomery Street, Suite 3400  
San Francisco, CA 94104  
Telephone: 415-633-1949  
Facsimile: 415-693-0770  
mlehman@hausfeldllp.com  
clebsock@hausfeldllp.com

*Interim Co-Lead Counsel*

GOLD BENNETT CERA & SIDENER LLP  
SOLOMON B. CERA  
C. ANDREW DIRKSEN  
595 Market Street, Suite 2300  
San Francisco, CA 94105  
Telephone: 415-777-2230  
Facsimile: 415-777-5189  
scera@gbcslaw.com  
cdirkсен@gbcslaw.com

COHEN MILSTEIN SELLERS & TOLL, PLLC  
MANUEL JOHN DOMINGUEZ  
2925 PGA Boulevard, Suite 200  
Palm Beach Gardens, FL 33410  
Telephone: 561-833-6575  
Facsimile: 561-515-1401  
dominguez@cohenmilstein.com

MICHAEL B. EISENKRAFT (ME-6974)  
88 Pine Street, Fourteenth Floor  
New York, NY 10005  
Telephone: 212-828-7797  
Facsimile: 212-828-7745  
meisenkraft@cohenmilstein.com

*Counsel for Plaintiff Aureus Currency Fund L.P.*

OBERMAYER REBMANN MAXWELL &  
HIPPEL LLP  
WILLIAM J. LEONARD  
One Penn Center, 19th Floor  
1617 John F. Kennedy Boulevard  
Philadelphia, PA 19103-1895  
Telephone: 215-665-3000  
Facsimile: 215-665-3165  
william.leonard@obermayer.com

BONI & ZACK LLC  
MICHAEL J. BONI  
JOSHUA D. SNYDER  
15 St. Asaphs Rd.  
Bala Cynwyd, PA 19004  
Telephone: 610-822-0200  
Facsimile: 610-822-0206  
mboni@bonizack.com  
jsnyder@bonizack.com

*Counsel for Plaintiff the City of Philadelphia,  
Board of Pensions and Retirement*

ROBBINS GELLER RUDMAN & DOWD LLP  
PATRICK J. COUGHLIN  
DAVID W. MITCHELL  
BRIAN O. O'MARA  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619-231-1058  
patc@rgrdlaw.com  
davidm@rgrdlaw.com  
bomara@rgrdlaw.com

*Counsel for Plaintiff Employees' Retirement System  
of the Government of the Virgin Islands*

WOLF POPPER LLP  
MARIAN R. ROSNER  
PATRICIA I. AVERY  
FEI-LU QIAN  
845 Third Avenue, 12th Floor  
New York, NY 10022  
Telephone: 212-759-4600  
Facsimile: 212-486-2093  
mrosner@wolfdpopper.com  
pavery@wolfdpopper.com  
fqian@wolfdpopper.com

*Counsel for Plaintiff Employees' Retirement  
System of Puerto Rico Electric Power Authority*

BERMAN DeVALERIO  
JOSEPH J. TABACCO, JR. (JJT-1994)  
TODD A. SEAVER  
SARAH KHORASANEE MCGRATH  
JESSICA MOY  
One California Street, Suite 900  
San Francisco, CA 94111  
Telephone: 415-433-3200  
Facsimile: 415-433-6382  
jtabacco@bermandevalerio.com  
tseaver@bermandevalerio.com  
smcgrath@bermandevalerio.com  
jmoy@bermandevalerio.com

*Counsel for Plaintiff Fresno County Employees'  
Retirement Association*

THE MOGIN LAW FIRM, P.C.  
DANIEL J. MOGIN  
JODIE M. WILLIAMS  
PHILLIP E. STEPHAN  
707 Broadway, Suite 1000  
San Diego, CA 92101  
Telephone: 619-687-6611  
Facsimile: 619-687-6610  
dmogin@moginlaw.com  
jwilliams@moginlaw.com  
pstephan@moginlaw.com

KOREIN TILLERY, LLC  
STEPHEN M. TILLERY  
ROBERT L. KING  
AARON M. ZIGLER  
STEVEN M. BEREZNEY  
RICHARD M. ELIAS  
One U.S. Bank Plaza  
505 N. 7th Street, Suite 3600  
Saint Louis, MO 63101-1612  
Telephone: 314-241-4844  
Facsimile: 314-241-3525  
stillery@koreintillery.com  
rking@koreintillery.com  
azigler@koreintillery.com  
sberezney@koreintillery.com  
relias@koreintillery.com

-and-

KOREIN TILLERY, LLC  
GEORGE A. ZELCS  
205 N Michigan Ave, Ste 1950  
Chicago, IL 60601-5927  
Telephone: 312-641-9750  
Facsimile: 312-641-9751  
gzlcs@koreintillery.com

GLANCY BINKOW & GOLDBERG LLP  
LEE ALBERT  
122 East 42nd Street, Suite 2920  
New York, NY 10168  
Telephone: 212-682-5340  
lalbert@glancylaw.com

*Counsel for Plaintiffs Haverhill Retirement System  
and Oklahoma Firefighters Pension and Retirement  
System*

LABATON SUCHAROW LLP  
LAWRENCE A. SUCHAROW  
GREGORY S. ASCIOLLA  
JAY L. HIMES  
CHRISTOPHER KELLER  
ERIC J. BELFI  
MICHAEL W. STOCKER  
ROBIN A. VAN DER MEULEN  
MATTHEW J. PEREZ  
140 Broadway  
New York, NY 10005  
Telephone: 212-907-0700  
Facsimile: 212-818-0477  
lsucharow@labaton.com  
gasciolla@labaton.com  
jhimes@labaton.com  
ckeller@labaton.com  
ebelfi@labaton.com  
mstocker@labaton.com  
rvandermeulen@labaton.com  
mperez@labaton.com

*Counsel for Plaintiff State-Boston Retirement  
System*

GRANT & EISENHOFER, P.A.  
LINDA P. NUSSBAUM (LN-9334)  
PETER A. BARILE III (PB-3354)  
485 Lexington Avenue  
New York, NY 10017  
Telephone: 646-722-8500  
Facsimile: 646-722-8501  
lnussbaum@gelaw.com  
pbarile@gelaw.com

*Counsel for Plaintiff Syena Global Emerging  
Markets Fund, LP*

ENTWISTLE & CAPPUCCI LLP  
ANDREW J. ENTWISTLE  
VINCENT R. CAPPUCCI  
ROBERT N. CAPPUCCI  
280 Park Avenue, 26th Floor West  
New York, NY 10017  
Telephone: 212-894-7200  
Facsimile: 212-894-7272  
aentwistle@entwistle-law.com  
vcappucci@entwistle-law.com  
rcappucci@entwistle-law.com

*Counsel for Plaintiffs Tiberius OC Fund, Ltd. and  
Value Recovery Fund L.L.C.*

LOWEY DANNENBERG COHEN & HART, P.C.  
VINCENT BRIGANTI  
GEOFFREY M. HORN  
PETER D. ST. PHILLIP  
RAYMOND P. GIRNYS  
One North Broadway  
White Plains, NY 10601  
Telephone: 914-997-0500  
Facsimile: 914-997-0035  
vbriganti@lowey.com  
ghorn@lowey.com  
pstphillip@lowey.com  
rgirnys@lowey.com

-and-



LOWEY DANNENBERG COHEN & HART, P.C.  
GERALD LAWRENCE, ESQ.  
Four Tower Bridge  
200 Barr Harbor Drive, Suite 400  
West Conshohocken, PA 19428  
Telephone: 610-941-2760  
Facsimile: 610-862-9777  
glawrence@lowey.com

SHEPHERD FINKELMAN  
MILLER & SHAH, LLP  
ERIC. L. YOUNG  
NATALIE FINKELMAN BENNETT  
35 East State Street  
Media, PA 19063  
Telephone: 610-891-9880  
Facsimile: 866-300-7367  
eyoung@sfmslaw.com  
nfinkelman@sfmslaw.com

-and-

SHEPHERD FINKELMAN  
MILLER & SHAH, LLP  
JAMES E. MILLER  
65 Main Street  
Chester, CT 06412  
Telephone: 860-526-1100  
Facsimile: 860-526-1120  
jmiller@sfmslaw.com

RADICE LAW FIRM, P.C.  
JOHN RADICE  
34 Sunset Blvd.  
Long Beach, NJ 08008  
Telephone: 646-245-8502  
Facsimile: 609-385-0745  
jradice@radicelawfirm.com

MANDEL BHANDARI LLP  
RISHI BHANDARI  
EVAN MANDEL  
11 Broadway, Suite 615  
New York, NY 10004  
Telephone: 212-269-5600  
Facsimile: 646-964-6667  
rb@mandelbhandari.com  
em@mandelbhandari.com

*Counsel for Plaintiff United Food and Commercial  
Workers Union and Participating Food Industry  
Employers Tri-State Pension Fund*

BERGER & MONTAGUE  
H. LADDIE MONTAGUE, JR.  
MERRILL G. DAVIDOFF  
BART D. COHEN  
1622 Locust Street  
Philadelphia, PA 19103  
Telephone: 215-875-3000  
Facsimile: 215-875-4604  
hlmontague@bm.net  
mdavidoff@bm.net  
bcohen@bm.net

FINE, KAPLAN AND BLACK, R.P.C.  
ROBERTA D. LIEBENBERG  
ADAM PESSIN  
One South Broad St., Suite 2300  
Philadelphia, PA 19107  
Telephone: 215-567-6565  
Facsimile: 215-568-5872  
rliebenberg@finekaplan.com  
apessin@finekaplan.com

MOTLEY RICE LLC  
WILLIAM H. NARWOLD  
DONALD A. MIGLIORI  
MICHAEL M. BUCHMAN  
JOHN A. IOANNOU  
600 Third Avenue, 21st Floor  
New York, NY 10016  
Telephone: 212-577-0040  
Facsimile: 212-577-0054  
bnarwold@motleyrice.com  
dmigliori@motleyrice.com  
mbuchman@motleyrice.com  
jioannou@motleyrice.com

MILLER LAW LLC  
MARVIN A. MILLER  
MATTHEW VAN TINE  
115 S. LaSalle St., Suite 2910  
Chicago, IL 60603  
Telephone: 312-322-3400  
Facsimile: 312-676-2676  
mmiller@millerlawllc.com  
mvantine@millerlawllc.com

*Of Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 30, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 30, 2015.

/s/ Christopher M. Burke  
CHRISTOPHER M. BURKE  
SCOTT+SCOTT, ATTORNEYS AT LAW, LLP  
707 Broadway, Suite 1000  
San Diego, CA 92101  
Telephone: 619-233-4565  
Facsimile: 619-233-0508  
email: cburke@scott-scott.com